

HEATHER E. WILLIAMS, SBN 122664
Federal Defender
HOOTAN BAIGMOHAMMADI, SBN 279105
Assistant Federal Defender
Designated Counsel for Service
801 I Street, Third Floor
Sacramento, CA 95814
T: (916) 498-5700
F: (916) 498-5710

Attorneys for Defendant
Mr. Kinney

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:23cr318-TLN
)
Plaintiff,) STIPULATION AND ORDER TO MODIFY
) CONDITIONS OF RELEASE
vs.)
) Judge: Hon. Deborah Barnes
JOSEPH PAUL HERRERA)
KINNEY,)
)
<u>Defendant.</u>)

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Alstyn Bennett, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joseph Paul Herrera Kinney, that the amended special conditions of bond be modified as follows.

The parties specifically stipulate as follows:

1. Mr. Kinney is on pretrial release and his amended special conditions restrict him to home detention. ECF no. 30 at ¶ 16.
2. Mr. Kinney moves for special condition #16 to be amended to add that Mr. Kinney may attend his son's soccer games and practices, with pre-approval from pretrial services, so long as Mr. Kinney's attendance does not interfere with

1 amended special condition # 13 that he not associate or have any contact with
2 Cecilia Brunoprieto.

3 3. The government and pretrial services do not object to Mr. Kinney's motion.
4

5 Respectfully submitted,

6 HEATHER E. WILLIAMS
7 Federal Defender

8 Date: April 9, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Kinney

11 Date: April 9, 2024

12 PHILLIP A. TALBERT
13 United States Attorney

/s/ Alstyn Bennett
ALSTYN BENNETT
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: April 10, 2024


DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE